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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 YEN LILY HO,

14 Plaintiff,

15 vs.

16 KILILO KIJAKAZI,
Acting Commissioner of Social Security,

17 Defendant.

)
) Case No.: 2:22-cv-02008-EJY

) **UNOPPOSED MOTION FOR EXTENSION OF**
) **TIME TO FILE RESPONSE TO MOTION TO**
) **REMAND**

) **(FIRST REQUEST)**
)
)
)

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), by
 2 and through her undersigned attorneys, hereby moves for a 35-day extension of time to file her response
 3 to Plaintiff’s motion to remand. The response is due to be filed by April 18, 2023. This is the
 4 Commissioner’s first request for an extension of time to file the response.

5 Defendant submits that good cause exists for this extension request because the attorney tasked
 6 with writing the response was recently assigned to this case and has several concurrent deadlines, and
 7 therefore needs sufficient time to review the record, evaluate the issues raised in Plaintiff’s motion to
 8 remand, and prepare Defendant’s response. Defendant’s counsel will endeavor to complete these tasks as
 9 soon as possible. This request is made in good faith and with no intention to unduly delay the
 10 proceedings, and counsel apologizes for any inconvenience. Accordingly, Defendant requests an
 11 extension in which to respond to file the response until May 23, 2023.

12 The undersigned conferred with Plaintiff’s counsel, who confirmed on April 12, 2023, that Plaintiff
 13 has no objection to the requested extension.

14 It is therefore respectfully requested that Defendant be granted an extension of time to file the
 15 response to Plaintiff’s motion to remand, through and including May 23, 2023.

16
 17 Dated: April 12, 2023

JASON M. FRIERSON
 United States Attorney

19 /s/ Michonne L. Omo
 20 MICHONNE L. OMO
 Special Assistant United States Attorney

22 IT IS SO ORDERED:

23 
 24 UNITED STATES MAGISTRATE JUDGE

25 DATED: April 12, 2023
 26 _____